



Virgin Media O2 response to Ofcom's consultation on:

Ofcom's response to Vodafone's and Telefónica's requests to update the technical conditions of their mobile licences to enable the deployment of newer technologies including 5G:

Variation of certain licences held by Vodafone and Telefónica in the 900 MHz, 1800 MHz, 2100 MHz and 2.6 GHz bands

July 2022

Virgin Media O2 (“VMO2”) welcomes the opportunity to respond to Ofcom’s consultation on Ofcom’s response to Vodafone’s and Telefónica’s requests to update the technical conditions of their mobile licences to enable the deployment of newer technologies including 5G: Variation of certain licences held by Vodafone and Telefónica in the 900 MHz, 1800 MHz, 2100 MHz and 2.6 GHz bands¹.

We provide below, our responses to Ofcom’s specific consultation questions.

Question 1a: Do you have any comments on our proposal to agree to Vodafone’s request for changes to its licences in the 900 MHz and 1800 MHz bands to enable 5G?

We note that Ofcom are proposing to set TRP for 1800 MHz, at 50 dBm/(5 MHz). This is 7 dB lower than the ECC/CERP upper bound in-band power recommendations. We would be grateful if Ofcom could explain its rationale for this.

Question 1b: Do you have any comments on our proposal to make substantially similar licence changes available to the other MNOs with licences in the 900 MHz and 1800 MHz bands?

We support Ofcom’s proposal to make substantially similar licence changes available to the other MNOs with licences in the 900 MHz and 1800 MHz bands.

Question 2a: Do you have any comments on our proposal to agree to Vodafone’s request for changes to its licence in the 2100 MHz band to enable 5G?

We note that Ofcom are proposing to set TRP for 2100 MHz, at 50 dBm/(5 MHz). This is 7 dB lower than the ECC/CERP upper bound in-band power recommendations. We would be grateful if Ofcom could explain its rationale for this.

Question 2b: Do you have any comments on our proposal to make substantially similar licence changes available to the other MNOs with licences in the 2100 MHz band?

We support Ofcom’s proposal to make substantially similar licence changes available to the other MNOs with licences in the 2100 MHz band.

Question 3a: Do you have any comments on our proposal to agree to Vodafone’s request for changes to its licence in the 2.6 GHz band to enable 5G?

We note that Ofcom are proposing to set upper bound in-block powers for 2.6 GHz, to 46 dBm/5 MHz for AAS base stations. This is 7 dB lower than the lower ECC Decision (05)05 stated power level, in which the non-obligatory upper bound in-block power is stated as between 53 and 60 dBm/(5 MHz) for AAS base stations. We would be grateful if Ofcom could explain its rationale for this.

¹ https://www.ofcom.org.uk/data/assets/pdf_file/0026/237824/vodafone-telefonica-licence-variation.pdf

Question 3b: Do you have any comments on our proposal to make substantially similar licence changes available to the other MNOs with paired spectrum licences in the 2.6 GHz band?

We support Ofcom's proposal to make substantially similar licence changes available to the other MNOs with paired spectrum licences in the 2.6 GHz band.

Question 4: Do you have any comments on our proposal to vary Telefónica's and Vodafone's licences in the 2570 MHz to 2620 MHz sub-band to relax restrictions in relation to the 5 MHz restricted block?

We support Ofcom's proposal to vary Telefónica's and Vodafone's licences in the 2570 MHz to 2620 MHz sub-band to relax restrictions in relation to the 5 MHz restricted block.